

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND
SOUTHERN DIVISION**

RAMON CLARK	:
	:
	:
Plaintiff,	:
	:
	Civil Action No.: DKC-422
v.	:
	:
	:
AMF BOWLING CENTERS, INC.	:
	:
	:
Defendant.	:

PLAINTIFF'S MOTION FOR ATTORNEY'S FEES

Plaintiff, by and through counsel, Joseph Cammarata, Esquire and Steven H. Kaminski, Esquire and the law firm of Chaikin, Sherman, Cammarata & Siegel, P.C., pursuant to this Court's December 17, 2007 Order, moves this Court for an Order awarding Attorney's Fees against Defendant AMF Bowling Centers, Inc. ("AMF"), and as reasons therefor, hereby states:

1. This case arises from an injury that occurred on Defendant AMF's premises in Prince George's County, Maryland. On February 19, 2005, Plaintiff tripped and fell on a displaced portion of a bowling alley lane. Plaintiff sustained personal injuries due to Defendant's failure to properly maintain and/or discontinue use of the bowling alley lane.

2. On December 17, 2007 this Court granted Plaintiff's request for Attorney's Fees and Costs arising from Defendant's failure to respond to Plaintiff's discovery requests, which required Plaintiff to file a Motion to Compel those requests, and Plaintiff's Motion for Sanctions for Defendant's failure to appear at its 30(b)(6) Deposition.

3. Plaintiff requests that this Court Order Defendant to pay a total of \$850.00 in attorney's fees for its failures of discovery. Plaintiff's attorney Steven H. Kaminski spent one hour drafting and proof-reading Plaintiff's Motion to Compel before it was filed. *See Exhibit 1: Affidavit of Steven H. Kaminski.* Additionally, Mr. Kaminski spent one hour drafting Plaintiff's Notice of 30(b)(6) Deposition – the deposition which Defendant ultimately canceled. *See id.* Mr. Kaminski charges \$200.00 per hour for his legal services. *See id.*

4. Plaintiff's attorney Joseph Cammarata spent one hour reviewing Notice of 30(b)(6) Deposition and reviewing the file in preparation for Defendant's 30(b)(6) deposition. *See Exhibit 2: Affidavit of Joseph Cammarata.* It was at that point that Mr. Cammarata spoke with Defense counsel who advised him that Defendant's corporate designees would not appear for their depositions the following day. Mr. Cammarata proceeded to draft a letter to Defense counsel concerning the untimely cancelation of the Defendant's deposition. Mr. Cammarata charges \$450.00 per hour for his legal services. *See id.*

5. For the above-referenced reasons and pursuant to this Court's Order, Plaintiff requests this Court Order Defendant AMF Bowling Centers, Inc. to pay \$850.00 in attorney's fees for its failures of discovery in this case.

WHEREFORE, Plaintiff moves this Court for an Order directing Defendant AMF
Bowling Centers, Inc. to pay \$850.00 in attorney's fees to Plaintiff's counsel.

Respectfully submitted,

**CHAIKIN, SHERMAN,
CAMMARATA & SIEGEL, P.C.**

/s/
Steven H. Kaminski, Esquire
Md. Dist. Ct. Bar No. 14543
The Law Building
1232 Seventeenth Street, N.W.
Washington, D.C. 20036
Attorneys for Plaintiff

GROUNDS AND AUTHORITIES

1. The record herein.

/s/
Steven H. Kaminski

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the Plaintiff's Motion for Attorney's Fees
was served electronically on this 31st day of December, 2007 to:

Kevin Karpinski, Esquire
Thomas S. Bouchelle, Esquire
Karpinski, Colaresi & Karp
120 East Baltimore Street
Suite 1850
Baltimore, MD 21202
Counsel for Defendant

/s/
Steven H. Kaminski

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AMF BOWLING CENTERS, INC. :
: :
Defendant. : :

ORDER

Upon consideration of the Plaintiff's Motion for Attorney's Fees, and any opposition thereto, it is this _____ day of _____, 2008, hereby,

ORDERED, that the Motion for Attorney's Fees be and hereby is **GRANTED**;
and it is further,

ORDERED, that Defendant AMF Bowling Centers, Inc. pay Plaintiff's counsel, Chaikin, Sherman, Cammarata & Siegel, P.C. \$850.00 within 10 days of the date of this Order.

Deborah K. Chasanow
United States District Court Judge

(Continued)

Copies to:

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